

February 5, 2018

Attn: Theresa Wildman
Regulatory and Technical Affairs Manager
Plant Products Inc.
50 Hazelton Street
Leamington, ON N8H 3W1

To Whom It May Concern,

Schlegel Poultry Compost (SPC), an operation formerly owned by Cold Springs Farm, has been producing high quality Turkey Litter Compost (TLC) since 1996. TLC is made from 67-75% turkey litter (manure plus softwood shavings bedding) produced in our turkey barns, blended with 25-33% Spent Mushroom Substrate (SMS) from local certified organic mushroom growing operations. The minor addition of SMS adds a fungal biomass component that aids in decomposing the bedding materials that have a high lignin content. The base of turkey manure provides a rich bacterial biomass along with a significant supply of both macro and micro nutrients, which we transform into stabilized organic matter.

SPC's complete supply chain control over the ingredients in our compost is critical to our quality product. No municipal waste or sewage sludge is used to make TLC. Only farms directly affiliated with Schlegel Poultry, receiving feed rations we specify, provide the litter used to make our TLC. SPC's end to end control of both materials and process results in a highly consistent product. The composting process is carefully managed, since composting is a biological activity where microorganisms do the work. The key is to provide and maintain the right conditions for beneficial microbes to thrive. When the turkey litter arrives at our composting site, water is added to establish the correct moisture content for proper composting. Moisture and temperature continue to be monitored after each turning to ensure viable weed seeds and pathogenic microorganisms are destroyed during the process.

Tests for Salmonella species in our finished compost are consistently negative, providing additional assurance that our composting system is working properly. Our actively composting windrows are turned a minimum of 5 times during the thermophilic (high temperature) phase,

over a time period well in excess of the required 15 day minimum. After the high temperature phase is completed, the frequency of turning the compost windrows decreases during the curing phase while the organic matter matures into dark, rich humus with an earthy aroma.

After curing, the finished compost is screened through a ¾" trommel screen to remove any foreign material prior to sale, and for some applications is double-screened to 3/8" minus. Since there are no municipal wastes used to make our TLC, we have no issue with visible contaminants (such as the glass and plastic residues often found in waste-based composts) or invisible contaminants such as arsenic, cadmium, lead and mercury. The only foreign material that needs to be screened out of the finished product is stones that are picked up during handling of the product. Schlegel Poultry Compost is a member of the Compost Quality Alliance (CQA) program, and our finished product undergoes a detailed testing process six times per year as part of the CQA requirements for: trace metals, E. coil, fecal coliforms, salmonella, foreign material, plastics, sharps, organic matter, moisture content, particle size, and compost biological stability (maturity). SPC's TLC product consistently meets the requirements of the Canadian Organic Standard for use on certified organic crops.

Schlegel Poultry's facilities and records are inspected annually by Pro-Cert™, and our product meets the requirements of the Canadian Organic Standard (COS) as well as the USA National Organic Program (NOP). Clause 5.5.1 of the COS requires that our manure come from a production system where the animals are not fully caged, are free to turn 360°, and are not permanently kept in the dark. We also keep records on the sources and quantities of manure produced. I hope the above information is adequate to explain the composting materials and process used at Schlegel Poultry Compost. If you require additional information, please do not hesitate to contact me.

Regards,

Jon Gingerich

Compost Operations Manager Cell phone: (519) 868-1465

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